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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re: ) Case No. 18-03197-FPC11  
GIGA WATT INC, )  
Debtor. ) MOTION AND NOTICE TO LIMIT  
 ) NOTICE OF MOTION TO WITHDRAW  
 ) AS COUNSEL OF RECORD AND  
 ) NOTICE THEREOF  
)

Come now William L. Hames and John W. O’Leary of Gravis Law, PLLC, (the “Firm”) attorneys of record for creditor Chelan Douglas Regional Port Authority, formerly the Port of Douglas County (the “Port”), former landlord of Debtor herein, and hereby requests the court’s authorization to limit notice of their Motion to Withdraw as Counsel of Record and Notice Thereof filed simultaneously herewith. The Firm seeks to limit notice to the following:

- a) Chapter 11 Trustee
- b) the US Trustee's office,
- c) Benjamin A. Ellison, on behalf of the unsecured creditors' committee,
- d) All parties receiving ECF notice and
- e) the 20 largest creditors as designated on the Debtor's schedules

The Chapter 11 Trustee and the unsecured Creditors' Committee are both represented by counsel. The Firm submits that limiting notice will not prejudice any creditor. Further, the costs of serving all creditors in this case would be prohibitive.

MOTION AND NOTICE TO LIMIT NOTICE OF  
MOTION TO WITHDRAW AS COUNSEL OF  
RECORD AND NOTICE THEREOF - 1

GRAVIS LAW, PLLC  
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LBR 2002-1 permits less inclusive notice to be given “if not prohibited by the Code or Rules, and specifically allowed by the Court...” LBR 2002-1(b)(1)(B). The Firm is not aware of any specific prohibitions against the court entering an order permitting limitation of notice as requested herein and submits that good cause exists for so doing.

## NOTICE

IF YOU OBJECT TO THE RELIEF REQUESTED ABOVE, YOU MUST FILE A WRITTEN OBJECTION WITH THE CLERK OF THE ABOVE-ENTITLED COURT AND REQUEST A HEARING AT P.O. BOX 2164, W. 904 RIVERSIDE, ROOM 321, SPOKANE, WASHINGTON 99210, ON OR BEFORE 17 DAYS (14 DAYS PLUS 3 DAYS FOR MAILING) FROM THE DATE OF THIS NOTICE AND SERVE A COPY ON THE UNDERSIGNED AT 601 W. KENNEWICK AVENUE, KENNEWICK, WASHINGTON 99336; MARK WALDRON, CHAPTER 11 TRUSTEE, AT 6711 REGENTS BOULEVARD WEST, SUITE B, TACOMA, WA 98466; AND UPON THE OFFICE OF THE UNITED STATES TRUSTEE, 920 W. RIVERSIDE, STE. 593, SPOKANE, WA 99201.

SHOULD YOU FAIL TO OBJECT AS SET FORTH ABOVE, PLEASE  
FURTHER BE ADVISED THAT THE RELIEF REQUESTED MAY BE GRANTED  
WITHOUT FURTHER NOTICE TO YOU.

DATED this 12<sup>th</sup> day of October 2021.

GRAVIS LAW, PLLC  
Attorneys for creditor Chelan Douglas Regional  
Port Authority, formerly the Port of Douglas  
County

BY: /s/ John W. O'Leary  
JOHN W. O'LEARY, WSBA #33004

MOTION AND NOTICE TO LIMIT NOTICE OF  
MOTION TO WITHDRAW AS COUNSEL OF  
RECORD AND NOTICE THEREOF - 2

GRAVIS LAW, PLLC  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re: ) Case No. 18-03197-FPC11  
GIGA WATT INC, )  
Debtor. ) [PROPOSED] ORDER LIMITING NOTICE  
 ) OF MOTION TO WITHDRAW AS  
 ) COUNSEL OF RECORD AND NOTICE  
 ) THEREOF  
)

This matter having come before the above-entitled court on the motion of William L. Hames and John W. O’Leary of Gravis Law, PLLC, to limit notice of their Motion to Withdraw as Counsel of Record for creditor Chelan Douglas Regional Port Authority, formerly the Port of Douglas County (the “Port”), and the court finding that good cause exists to grant the relief requested, NOW, THEREFORE,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED the counsels' motion is granted.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that notice of William L. Hames, John W. O'Leary and Gravis Law, PLLC's Motion to Withdraw as Counsel of Record may be limited to:

a) Chapter 11 Trustee;

ORDER LIMITING NOTICE OF MOTION TO  
WITHDRAW AS COUNSEL OF RECORD AND  
NOTICE THEREOF - 1

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1                   b) Office of the US Trustee;  
2                   c) The Unsecured Creditor's Committee;  
3                   d) All parties receiving ECF notice; and,  
4                   e) 20 largest creditors as listed on Debtor's schedules.

5                   // / END OF ORDER // /

6 Presented by:

7 GRAVIS LAW, PLLC  
8 Attorneys for Creditor Chelan Douglas  
9 Regional Port Authority, formerly the  
Port of Douglas County

10 By: JOHN W. O'LEARY, WSBA #33004  
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ORDER LIMITING NOTICE OF MOTION TO  
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NOTICE THEREOF - 2

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